

[Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORDER ADOPTING

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB
**STIPULATION REGARDING
PRODUCTION OF HYPERLINK
METADATA OVERLAYS**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

Pursuant to Dkt. No. 2470, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”) (jointly, “the parties”), respectfully submit this Joint Stipulation.

Defendants represent that, to the best of their knowledge, “the February metadata overlay consisted of family relationship information that could not have been included when documents were originally produced.” *See* Dkt. No. 2470.

With respect to “the schedule for production of overlays providing such family relationship information going forward,” *see* Dkt. No. 2470:

1. Defendants agree to produce overlays providing such hyperlink-related metadata on a twice monthly basis going forward until such overlays are no longer required.
2. Defendants agree to limit those overlays to documents receiving updated hyperlink metadata.
3. Defendants agree to provide cover letters for those overlays stating that, to the best of

1 their knowledge, the overlay consists of hyperlink-related metadata that could not have been included
2 when documents were originally produced or at the time of the previous overlay production.

3
4
5 By: /s/ Rachel B. Abrams
6 RACHEL B. ABRAMS (SBN 209316)
7 **PEIFFER WOLF CARR KANE**
8 **CONWAY & WISE, LLP**
9 555 Montgomery Street, Suite 820
San Francisco, CA 94111
Telephone: (415) 426-5641
Email: rabrams@peifferwolf.com

10 ROOPAL P. LUHANA (*Pro Hac Vice*)
11 **CHAFFIN LUHANA LLP**
12 600 Third Avenue, Fl. 12
13 New York, NY 10016
14 Telephone: (888) 480-1123
Email: luhana@chaffinluhana.com
15 *Co-Lead Counsel for Plaintiffs*

16 SARAH R. LONDON (SBN 267083)
17 **GIRARD SHARP LLP**
18 601 California St., Suite 1400
19 San Francisco, CA 94108
20 Telephone: (415) 981-4800
21 slondon@girardsharp.com

By: /s/ Michael B. Shortnacy
MICHAEL B. SHORTNACY (SBN: 277035)
mshortnacy@shb.com
SHOOK, HARDY & BACON, L.L.P.
2049 Century Park East, Suite 3000
Los Angeles, CA 90067
Telephone: (424) 285-8330
Facsimile: (424) 204-9093

PATRICK OOT (*Pro Hac Vice* admitted)
oot@shb.com
SHOOK, HARDY & BACON, L.L.P.
1800 K Street NW, Suite 1000
Washington, DC 20006
Telephone: (202) 783-8400
Facsimile: (202) 783-4211

RANDALL S. LUSKEY (SBN: 240915)
rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (628) 432-5100
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
ratkins@paulweiss.com
CAITLIN E. GRUSAUSKAS (*Pro Hac Vice*
admitted)
cgrusauskas@paulweiss.com
ANDREA M. KELLER (*Pro Hac Vice* admitted)
akeller@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: March 14, 2025

By: /s/ Rachel B. Abrams



Dated: March 14, 2025